

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Adam Climek,)	FILED: MAY 6, 2008
)	08CV2610 J. N.
<i>Plaintiff,</i>)	JUDGE LEFKOW
)	MAG. JUDGE BROWN
-vs-)	No. 08 CV ____
)	(jury demand)
Sheriff of Cook County and Cook County,)	
)	
<i>Defendants.</i>)	

COMPLAINT

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. §1983. Plaintiffs invoke the jurisdiction of the Court pursuant to 28 U.S.C. §1343.
2. Defendants Sheriff of Cook County has exclusive custodial control over the Cook County Jail and is sued in his official capacity only.
3. Defendant Sheriff has a duty to screen for medical and mental health problems each person being processed into the Cook County Jail. The Sheriff also has a duty to provide care and treatment for any prisoner at the jail who faces a substantial risk of serious harm without such care and treatment.
4. Defendant Sheriff has delegated the above referred duties to "Cermak Health Services," a division of defendant Cook County.
5. In the two-year period preceding the filing of this complaint, defendants have applied a variety of policies and practices which caused serious harm to

plaintiff. These policies and practices are at issue in a case pending on plaintiffs' motion for class certification, *Parish v. Sheriff*, 07 CV 4369. include the following:

6. Plaintiff Adam Climek was admitted to the jail in May of 2007, following surgery.

7. When plaintiff arrived at the jail, it was obvious from his physical condition and his medical records that he should receive antibiotics, that the dressing on his surgical wound should be changed and the wound cleaned several times a day, and that plaintiff should continue to receive anti-psychotic medication.

8. As the result of defendants' above referred policies, plaintiff did not receive the medical care referred to in paragraph 7 above and as a result incurred serious harm.

9. Plaintiff demands trial by jury.

Wherefore plaintiff request that judgment be entered in his favor in an amount in excess of one hundred thousand dollars as compensatory damages, and that the Court award costs and fees pursuant to 42 U.S.C. §1988.

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